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INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR

REPORT OF INVESTIGATION LACK OF GOVERNMENT GIFT CARD ACCOUNTABILITY AT SAFETY & SECURITY OFFICE, BLM



OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR

REPORT OF INVESTIGATION

Case Title Lack of Government Gift Card Accountability at Safety and Security Office, BLM	Case Number OI-PI-17-0820-I
Reporting Office Program Integrity Division	Report Date March 19, 2018
Report Subject Report of Investigation	

SYNOPSIS

We initiated an investigation after conducting an inventory of a safe located in the Bureau of Land Management's (BLM's) Office of Law Enforcement and Security (OLES) in (b) (7)(C) and finding that approximately \$8,000 in gift cards were unaccounted for. BLM OLES (b) (7)(C) requested that we inventory the contents of the safe, which contained gift cards that the BLM (b) (7)(C) State Office had collected after an internal investigation and turned over to the OLES for safekeeping.

Office of Inspector General auditors inventoried the safe and found, among other items, a box containing the gift cards and several property receipts. There were 119 gift cards in the safe, valued at \$2,345, but the property receipts indicated that more than \$10,000 in gift cards had been provided to former OLES (b) (7)(C) and another BLM employee. There was no documentation showing the disposition of the additional gift cards, so we opened this investigation to determine what happened to them.

We were unable to determine the disposition of the additional gift cards because the BLM's documentation for the cards was incomplete and inaccurate, and (b) (7)(C) and the other BLM employees we interviewed did not recall specific details about how the gift cards were disposed of.

We are providing this report to the Acting BLM Director for any action deemed appropriate.

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DETAILS OF INVESTIGATION

We initiated this investigation on August 31, 2017, after Office of Inspector General (OIG) auditors inventoried the contents of a safe in the Bureau of Land Management's (BLM's) Office of Law Enforcement and Security (OLES) office in (b) (7)(C) at the request of OLES (b) (7)(C). When the auditors inventoried the safe in (b) (7)(C) 2017, they found 119 gift cards for various stores and restaurants, valued at \$2,345, and three Receipts for Property, indicating that more than \$10,000 in gift cards had been provided to former OLES (b) (7)(C) and another BLM employee (**Attachment 1**). There was no documentation showing the disposition of the additional gift cards reflected on the property receipts.

BLM's Office of Professional Responsibility (OPR) investigated the BLM (b) (7)(C) District's use of the gift cards as part of a nonmonetary-award incentive program for employees (**Attachment 2**). As a result of the OPR investigation, the purchasing of gift cards was permanently banned at all offices within the BLM (b) (7)(C) Office, and BLM (b) (7)(C) collected all unawarded gift cards. The cards were later approved for distribution to OLES and two other BLM offices for various uses.

Because of the discrepancy between the total amount of the cards collected and the amount the auditors found in the safe and the absence of documentation showing that the cards had been disposed of properly, we opened this investigation.

Records Did Not Show the Disposition of the Gift Cards

The auditors reviewed three unsigned property receipts they found in the safe with the cards. Each receipt named a different BLM employee—(b) (7)(C), (b) (7)(C), and (b) (7)(C)—and contained a list of gift cards assigned to that employee (See **Attachment 1**). The gift cards on the receipt associated with (b) (7)(C) appeared to be a master list of the gift cards collected, and the cards listed on the (b) (7)(C) and (b) (7)(C) receipts were primarily pulled from the (b) (7)(C) list (**Attachments 3, 4, and 5**). According to the auditors, the gift cards listed on the (b) (7)(C) receipt most closely matched the gift cards in the safe, except the gift card values listed on the receipt were slightly different from those on the actual gift cards (See **Attachment 1**).

The safe also contained an (b) (7)(C) 2012 email to (b) (7)(C) from then-(b) (7)(C) (b) (7)(C) suggesting what could be done with some of the gift cards (**Attachment 6**). In the email, (b) (7)(C) wrote that several OLES offices—the SIG or Special Investigative Group (Grand Junction, CO), Region 2 (Washington and Idaho), and Region 4 (Denver, Wyoming, Montana, North Dakota, and South Dakota)—had requested cards to purchase various pieces of equipment such as range supplies, binoculars, and a GPS unit. The safe did not contain any documentation showing that the cards were sent to these offices.

We interviewed (b) (7)(C), BLM (b) (7)(C), Support Services, who in 2012 was (b) (7)(C) handling the gift cards collected after the OPR investigation (**Attachments 7 and 8**). He said that the cards had been purchased as nonmonetary awards for employee achievement, but, for reasons he did not recall, BLM (b) (7)(C) had collected all unawarded cards from its district and field offices, and its human resources office was tasked with inventorying, storing, and safeguarding them.

According to (b) (7)(C) the BLM's (b) (7)(C) Office eventually instructed BLM (b) (7)(C) to divide the

cards into three different batches and send one batch to the OLES in (b) (7)(C) and the other two to the BLM's State offices in (b) (7)(C) and (b) (7)(C). (b) (7)(C) with this responsibility.

(b) (7)(C) said that OLES employees had been required to document that the cards had been inventoried and the receiving offices' shipping addresses verified, but BLM (b) (7)(C) later could not locate the shipment documentation because everyone who had been involved with processing or sending the cards in 2012, including (b) (7)(C) had left the BLM. He said his office contacted (b) (7)(C) about the gift cards, but she said that she did not recall any details and that any documentation should have been on file. (b) (7)(C) said they were able to find some, but not all, of the paperwork relating to the disposition of the gift cards. He said he did not have any reason to believe that the OLES, BLM (b) (7)(C), or BLM (b) (7)(C) "did anything inappropriately" with respect to the gift cards.

(b) (7)(C) provided copies of the incomplete paperwork to the OIG auditors, who reviewed the documents and found a list of all the gift cards that had been collected by the BLM (b) (7)(C) State Office from its field offices. The auditors determined the list contained a mathematical error that indicated the total was \$8,720, but the correct total was \$10,395 (See Attachment 1).

OLES Officials Did Not Recall Total Number or Value of Gift Cards Issued

On August 8, 2017, we interviewed (b) (7)(C) who stated that he was not responsible for the distribution and accountability of the gift cards even though they were issued to him (**Attachments 9 and 10**). When informed that OIG auditors found that more than \$10,000 worth of gift cards had been collected, but much fewer were accounted for in the safe, he said, "I don't know what that's all about."

(b) (7)(C) recalled that in 2011 or 2012, the OPR investigated the misuse of gift cards and that unused gift cards had been sent to him, along with a DI-105 property accountability form, for safekeeping at the OLES office. He said that he had signed the accountability form upon receiving the cards and that he or (b) (7)(C) inventoried the cards against the accountability form. (b) (7)(C) said, however, that he could not recall the number of cards that he was issued or their total value.

(b) (7)(C) said he kept all the gift cards in the safe until 2012, when BLM (b) (7)(C) authorized the OLES to use some of the cards to purchase equipment that would be useful for their law enforcement duties. According to (b) (7)(C) he directed (b) (7)(C) to ask the OLES' special agents in charge (SACs) if they needed any equipment, and the SACs requested items such as night vision goggles and GPS units. He said gift cards were sent to the SACs who asked for equipment, and the SACs were required to provide summaries and documentation of their purchases.

(b) (7)(C) said (b) (7)(C) was responsible for distributing the gift cards to the SACs and accounting for them. He said that there were records reflecting which cards were used and which remained in the safe, and he had inventoried and matched the cards against the receipts before he left the OLES. He noted that he did not believe the equipment purchased with the gift cards would have been inventoried because it was not sensitive equipment.

***Agent's Note:** The auditors did not find any records in the safe that documented (b) (7)(C) accounting of the gift cards after he received them nor was there a document that accurately reflected which cards had been provided to the SACs and which remained in the safe.*

On September 5, 2017, we interviewed (b) (7)(C), who said she did not recall specific details about

the gift cards (**Attachments 11 and 12**). She remembered that (b) (7)(C) abolished the gift card program after the OPR investigation and that the gift cards were then collected, but she did not know how many cards there were or their total value. She said she did not recall that the responsibility of inventorying or redistributing the gift cards had been assigned to her; she said that (b) (7)(C) was ultimately responsible for accountability of the gift cards.

We showed (b) (7)(C) the (b) (7)(C) 2012 email she sent to (b) (7)(C) proposing that the OLES use certain gift cards to acquire law enforcement equipment (see Attachment 6). (b) (7)(C) said she did not recall whether the SACs used the gift cards as she had proposed, but the OLES and the SACs who received cards would have kept records of how they were used.

(b) (7)(C) also recalled that (b) (7)(C) had inventoried the gift cards. The auditors contacted (b) (7)(C) but she said she did not remember any details about the cards (See Attachment 1).

DISPOSITION

We are providing this report to the Acting BLM Director for any action deemed appropriate.

ATTACHMENTS

1. Investigative Activity Report (IAR) Summarizing Auditor Review of BLM Gift Cards, dated February 27, 2018.
2. Memorandum: Review of (b) (7)(C) District Expenditures, dated July 13, 2011.
3. DI-105 Receipt for Property ((b) (7)(C)), unsigned and undated.
4. DI-105 Receipt for Property ((b) (7)(C)), unsigned and undated.
5. DI-105 Receipt for Property (b) (7)(C)), unsigned and undated.
6. Email from OLES (b) (7)(C) to OLES (b) (7)(C) , dated (b) (7)(C) 2012.
7. IAR – Interview of (b) (7)(C) on November 7, 2017.
8. Transcript – Interview of (b) (7)(C) on November 7, 2017.
9. IAR – Interview of (b) (7)(C) on August 8, 2017.
10. Transcript – Interview of (b) (7)(C) on August 8, 2017.
11. IAR – Interview of (b) (7)(C) on September 5, 2017.
12. Transcript – Interview of (b) (7)(C) on September 5, 2017.



ATTACHMENT 1



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INVESTIGATIVE ACTIVITY REPORT

Case Number OI-PI-17-0820-I	
Reporting Office Program Integrity	Report Date March 5, 2018
Report Subject Investigative Activity - Summarizing Auditor's Review of BLM Gift Cards	

On February 27, 2018, OIG Auditor (b) (7)(C) provided to DOI OIG Office of Investigations a summary of an inventory he conducted in (b) (7)(C) 2017 of a safe located within the offices of Office of Law Enforcement Services (OLES), Bureau of Land Management. The inventory was conducted at the request of (b) (7)(C).

In his summary, (b) (7)(C) said that he and OIG Auditor (b) (7)(C) inventoried the contents of the safe and found 119 gift cards for various stores and restaurants, valued at \$2,345, and three Receipts for Property (Receipts), indicating that more than \$10,000 in gift cards had been provided to former OLES (b) (7)(C) and possibly two other BLM employees: (b) (7)(C), and (b) (7)(C) (b) (7)(C) concluded that the Receipt for the (b) (7)(C) list came from the (b) (7)(C) State office and was broken down into the other two lists: (b) (7)(C) and (b) (7)(C). There was no documentation showing the disposition of the additional gift cards that were listed on the property receipts but were not in the safe.

(b) (7)(C) stated that he and (b) (7)(C) compared the gift cards to the Receipts that were found in the safe but found discrepancies between the quantities and values indicated. So, (b) (7)(C) attempted to reconcile the gift cards to records maintained by and recollections of different BLM employees and entities within BLM who had a role in collection, distribution and/or accountability of the gifts cards.

According to (b) (7)(C) (b) (7)(C) Support Services, explained that the cards had been purchased before April 2011. After April, the (b) (7)(C) State office was directed not to purchase any additional gift cards and to gather current gift card inventories from the field offices. (b) (7)(C) said the (b) (7)(C) office drafted a memo (to the BLM (b) (7)(C)) on (b) (7)(C) 2012, proposing what to do with the gift cards. The (b) (7)(C) State office inventoried the cards and sent them to the (b) (7)(C) OLES office in (b) (7)(C) 2012. The (b) (7)(C) State office also sent the restaurant cards to the (b) (7)(C) State office and the (b) (7)(C) State office for use in recognition ceremonies.

(b) (7)(C) also contacted (b) (7)(C) to discuss the inventory lists. She stated that she did not remember the details relating to the gift cards. Ultimately, (b) (7)(C) was unable to find records or receipts that accurately reflected the quantities of the gift cards, though he was provided a list of all gift cards

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obtained by BLM from the field offices. (b) (7)(C) reviewed the list and found that it contained a mathematical error. The total was indicated as \$8,720, but the correct total was \$10,395.

Along with his summary, (b) (7)(C) provided a Chain of Custody Report that listed all of the gift cards found in the OLES safe and subsequently stored in an OIG safe during the duration of the investigation. (b) (7)(C) also provided to DOI OIG Investigations additional documents supporting his summary. Please see the list below.

Additional documents provided to the OIG by (b) (7)(C)

- EMail - BLM Gift Card Writeup 022718.pdf
- BLM Request for Review of Gift Cards.pdf
- Gift Card Inventory_Verified Copy.pdf
- (b) (7)(C) Receipt.pdf
- (b) (7)(C) Receipt.pdf
- (b) (7)(C) Receipt.pdf
- Gift Card E-mails trail.pdf
- (b) (7)(C)-2012 e-mail.pdf
- BLM Copy of Gift Cards.pdf
- Chain of Custody Report.pdf



ATTACHMENT 2



ATTACHMENT 3



ATTACHMENT 4



ATTACHMENT 5



ATTACHMENT 6



ATTACHMENT 7



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INVESTIGATIVE ACTIVITY REPORT

Case Number OI-PI-17-0820-I	
Reporting Office Program Integrity	Report Date January 18, 2018
Report Subject Interview of (b) (7)(C)	

On November 7, 2017, Senior Investigator (b) (7)(C), with the Office of Inspector General (OIG), U.S. Department of the Interior (DOI), conducted a telephone interview with (b) (7)(C) Support Services for BLM (b) (7)(C). The purpose of the interview was to discuss the distribution and accountability of numerous gift cards that were assigned to the Office of Law Enforcement Security (OLES) in 2012. (b) (7)(C) stated that he received a Warnings and Assurances for Voluntary Interviews notice that (b) (7)(C) had previously sent to him on November 7, 2017; he explained that he was unable to print the form and sign it prior to the phone interview. He stated that he, nevertheless, understood the document and did not have any questions related to it. (b) (7)(C) agreed to have the interview recorded. The following is a summary of the interview.

(b) (7)(C) confirmed that he had previously spoken to OIG Auditor (b) (7)(C) regarding the gift cards, such as when they were transferred to OLES and for what purpose. (b) (7)(C) said the gift cards had already been purchased by BLM (b) (7)(C) by the time he arrived to the organization in (b) (7)(C). He recalled that the cards had been purchased as non-monetary awards for employee achievement, but, for reasons he did not recall, the State Office collected the cards from all of the district and field offices, and the BLM (b) (7)(C) office was tasked with inventorying, storing, and safeguarding the gift cards.

(b) (7)(C) said he provided an inventory list of the gift cards to (b) (7)(C) that indicated there were 256 gift cards, valued incorrectly at \$8,720. (b) (7)(C) explained that the spreadsheet on which the cards had been listed and the values totaled contained an error in one of the columns. The correct value of the cards was \$10,395.

According to (b) (7)(C) the (b) (7)(C) Office eventually instructed them to divide the cards into three different categories and send them to OLES, BLM (b) (7)(C), and BLM (b) (7)(C). (b) (7)(C) said then-(b) (7)(C) stipulated that when the gift cards were prepared to be sent to the three entities, a member of OLES (b) (7)(C) had to "initial-off" on the packing to verify that it was inventoried and shipped. However, when State Office personnel went to retrieve the documentation that showed the address that the cards had been shipped to, it could not be found. (b) (7)(C) elaborated that all of the

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people who had been initially involved with the gift cards at the time that they had been shipped were gone.

(b) (7)(C) elaborated that his office contacted (b) (7)(C), a former BLM (b) (7)(C) employee, who previously was delegated the responsibility to divide the gift cards into the separate groups, coordinate with OLES to transfer them, and ship them to the separate entities. (b) (7)(C) said (b) (7)(C) said that she did not recall the details relating to the gift card transactions that occurred in 2012, but the documentation should have been in the file. (b) (7)(C) stated, "And so we were able to find some of the documentation but not all of it that [provided] an audit trail on -- on what we did."

(b) (7)(C) conceded that the entities that received the gift cards should also have had copies of the inventory documents. However, he said there was high turnover in BLM, so, in (b) (7)(C) 2017, when BLM (b) (7)(C) attempted to contact the people who dealt with the cards in the (b) (7)(C) and (b) (7)(C) state offices in 2012, they were no longer in the organization. Other employees looked for the documents, but "came back empty handed;" they were unable to find inventory documents or the cards. (b) (7)(C) said they were not quite sure what else the organization could do to track the missing documentation, but they were willing to assist the OIG as much as possible.

(b) (7)(C) said he did not have any reason to believe that OLES, BLM (b) (7)(C), or BLM (b) (7)(C) "did anything inappropriately" regarding the gift cards. He said that there is no longer a gift card program and gift cards were no longer authorized for purchase.



ATTACHMENT 8



ATTACHMENT 9



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INVESTIGATIVE ACTIVITY REPORT

Case Title LACK OF GOVERNMENT GIFT CARD ACCOUNTABILITY AT SAFETY & SECURITY OFFICE, BLM	Case Number 17-0820
Reporting Office Program Integrity	Report Date August 9, 2017
Report Subject IAR for (b) (7)(C)	

On August 8, 2017, Senior Investigator (b) (7)(C), Office of Inspector General (OIG), conducted a phone interview of (b) (7)(C) Law Enforcement, Bureau of Land Management. The purpose of the interview was to discuss the distribution and accountability of numerous gift cards that were assigned to (b) (7)(C) in 2012. (b) (7)(C) reviewed, signed and returned a Voluntary Interview Notice form that (b) (7)(C) sent to him via email on August 7, 2017. He also agreed to have the interview recorded. The following is a summary of the interview:

(b) (7)(C) explained that sometime in 2011 or 2012, prior to him (b) (7)(C), BLM Office Law Enforcement Security (OLES), the BLM Office of Professional Responsibility conducted an investigation into the misuse of gift cards throughout BLM. (b) (7)(C) explained that the gift card program was a bureau-approved program with many “checks and balances” in place, but employees had not followed them. The probe resulted in several criminal convictions and garnered congressional attention. (b) (7)(C) said this prompted the Bureau to collect all of the remaining gift cards and secure them with OLES; in particular, the gift cards were issued to (b) (7)(C) via a DI-105 property accountability form.

When informed that there were records which indicated that approximately \$10,000 worth of gift cards had been assigned to him, but only \$2,800 were accounted for in the safe, (b) (7)(C) stated, “I don't know what that's all about.” (b) (7)(C) said he could not recall the number of gift cards or the total value of them; that if he stated an amount, he would “be guessing.” (b) (7)(C) recalled, however, that he signed an accountability form for the gift cards and that he and/or OLES (b) (7)(C) inventoried the cards against the accountability form upon receiving them. According to (b) (7)(C) the amounts matched and he signed for the gift cards.

(b) (7)(C) said he secured the gift cards in the safe for more than a year, when (b) (7)(C) authorized the law enforcement division to use some of the cards to purchase equipment that would be useful for their law enforcement duties. According to (b) (7)(C) he directed (b) (7)(C) to poll the

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special agents in charge (SACs) to see if they had any equipment needs. (b) (7)(C) said requests included such items as night vision goggles, GPS units and more. He said gift cards were sent to the requestors who were required to follow-up with summaries and documentation of what they used the gift cards for. (b) (7)(C) said (b) (7)(C) was responsible for distribution and accountability of the gift cards to the SACs. He said he did not believe the equipment that was purchased was inventoried because it was not sensitive equipment.

(b) (7)(C) stated that towards the end of his tenure as (b) (7)(C), he inventoried the gift cards and reconciled them to the property accountability form, DA-105, that accompanied the gift cards in the safe. He said the form accurately and precisely reflected the gift cards that were in the safe. He said he then created "a new property slip" reflecting transfer of the gift cards from his name to the (b) (7)(C). (b) (7)(C) did not know if (b) (7)(C) had yet inventoried the gift cards. When asked if he had used any of the cards for his personal benefit, that is, converted any to personal use, (b) (7)(C) stated, "No."



ATTACHMENT 10



ATTACHMENT 11



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Case Title LACK OF GOVERNMENT GIFT CARD ACCOUNTABILITY AT SAFETY & SECURITY OFFICE, BLM	Case Number OI-PI-17-0820-I
Reporting Office Program Integrity	Report Date September 20, 2017
Report Subject IAR for (b) (7)(C)	

On September 5, 2017, Senior Investigator (b) (7)(C), Office of Inspector General (OIG), conducted an interview of (b) (7)(C), former (b) (7)(C), Bureau of Land Management (BLM), Office of Law Enforcement and Security (OLES). The purpose of the interview was to discuss the distribution and accountability of numerous gift cards that were assigned to OLES in 2012. (b) (7)(C) reviewed and signed a Voluntary Interview Notice form and agreed to have the interview recorded. The following is a summary of the interview:

(b) (7)(C) said was assigned to OLES as (b) (7)(C) from (b) (7)(C) to (b) (7)(C). She began working at the U.S. Fish and Wildlife Service, Office of Law Enforcement in (b) (7)(C), following her tenure at BLM. (b) (7)(C) said that during her time at BLM, she reported to (b) (7)(C) until early 2011, then (b) (7)(C) became her supervisor.

(b) (7)(C) said she did not recall specific details regarding the gift cards that were procured or assigned in 2012. She did not recall that she was responsible for inventory and redistribution of the gift cards. Instead, (b) (7)(C) said, (b) (7)(C) was ultimately responsible for accountability of the gift cards.

She related that the BLM Office of Internal Affairs had a case relating to the misuse of gift cards by the BLM (b) (7)(C). (b) (7)(C) said the (b) (7)(C) was buying a lot of gift cards with government funds, but they were not accounting for them. (b) (7)(C) said the (b) (7)(C) was “warehousing” the cards and using some of them for personal purposes. She reiterated that the cards were not tracked or properly accounted for.

As a result, (b) (7)(C) continued, the BLM internal affairs office got involved, led by IA supervisor (b) (7)(C), whom she (b) (7)(C) at that time. According to (b) (7)(C), as a result of the “mess” relating to the gift cards, BLM (b) (7)(C) abolished the gift card program. (b) (7)(C) recalled that the gift cards were then collected, but she did not recall whether the gift cards were collected from just the (b) (7)(C) or all of BLM and she did not know the quantity of cards collected or the total

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value of them. (b) (7)(C) said (b) (7)(C) would know more information about the collection of the gift cards. She also recalled that (b) (7)(C), a BLM (b) (7)(C), had inventoried the cards, so she would be able to discuss the quantity and amounts.

(b) (7)(C) was shown an email dated (b) (7)(C), 2012 from herself to (b) (7)(C) in which (b) (7)(C) proposed use of specific gift cards by some OLES to acquire law enforcement equipment. (b) (7)(C) did not recall if the regions actually used the gift cards as proposed in the email, but she said that, if so, then those regions would have retained records relating to use of the gift cards. (b) (7)(C) said records should have been kept by the receiving regions, as well as OLES, which would have been responsible for distribution of the cards. (b) (7)(C) said that she did not recall being responsible for the distribution and accountability of the gift cards to BLM SAC's for the purpose of purchasing law enforcement equipment or for any other purpose.. (b) (7)(C) said she did not recall discussing the gift cards with (b) (7)(C)



ATTACHMENT 12